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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

MAXIMILIAN KLEIN, et al., on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

META PLATFORMS, INC., a Delaware
Corporation,

Defendant.

Case No. 3:20-cv-08570-JD

STIPULATED [PROPOSED] ORDER
MODIFYING SCHEDULE FOR EXPERT
DISCOVERY CUTOFF

Judge: Hon. James Donato

1 WHEREAS, this Court's November 18, 2022 Amended Scheduling Order set a schedule
2 for Plaintiffs' and Defendants' merits expert disclosures. Dkt. 379.

3 WHEREAS, the Amended Scheduling Order states that the merits expert discovery cut-off
4 is March 15, 2024. Dkt. 379.

5 WHEREAS, Plaintiffs and Meta (the "Parties") have worked together in good faith to
6 negotiate a merits expert deposition schedule that is mutually agreeable to the Parties, taking into
7 account all experts' professional and personal obligations, consistent with paragraph 8 of the
8 Court's Standing Order for Discovery in Civil Cases.

9 WHEREAS, the Parties have scheduled and will have completed fifteen depositions by the
10 merits expert discovery cut-off deadline.

11 WHEREAS, the Parties have conferred and jointly propose, subject to the Court's
12 approval, to modify this deadline to March 22, 2024 in order to allow for the completion of the
13 remaining five depositions. This stipulated proposed modification to the schedule will not affect
14 the April 5, 2024 deadline to file dispositive and merits *Daubert* motions or any other deadlines.

15 WHEREAS, the Parties agree that the deposition of Georgios Zervas should be scheduled
16 for March 19, 2024, the depositions of Yael Hochberg should be scheduled for March 19, 2024
17 and March 20, 2024, the deposition of Sarah Lamdan should be scheduled for March 21, 2024,
18 and the deposition of Becky Yoose should be scheduled for March 22, 2024.

19 NOW, THEREFORE, IT IS STIPULATED AND AGREED SUBJECT TO THE
20 COURT'S APPROVAL:

- 21 • The Parties agree that the following depositions will completed by March 22, 2024:
22 Georgios Zervas, Yael Hochberg, Sarah Lamdan, and Becky Yoose.

23 **IT IS SO STIPULATED.**

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1 DATED: March 12, 2024

Respectfully submitted,

2
3 By: /s/ Shana E. Scarlett
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SIGNATURE ATTESTATION

This document is being filed through the Electronic Case Filing (ECF) system by attorney Sonal N. Mehta. By her signature, Ms. Mehta attests that she has obtained concurrence in the filing of this document from each of the attorneys identified on the caption page and in the above signature block.

CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of March 2024, I electronically transmitted the foregoing document to the Clerk's Office using the CM/ECF System.

By: /s/ Sonal N. Mehta
Sonal N. Mehta

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: _____

JAMES DONATO
United States District Judge